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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MANICHANH SITIVONG,
Plaintiff,

vs.

UNITED STATES OF AMERICA,
Defendant.

CASE NO.: 2:22-cv-00169-APG-BNW

**JOINT DISCOVERY PLAN AND
[PROPOSED] SCHEDULING
ORDER**

**[SUBMITTED IN COMPLIANCE
WITH LR 26-1(B)]**

The parties, by and through their counsel of record, hereby submit the following Joint Discovery Plan and [Proposed] Scheduling Order pursuant to Rule 26(f)(3) and LR 26-1:

A. Meeting. Pursuant to Fed. R. Civ. P. 26(f) and LR 26-1(a), a meeting was held on May 4, 2021 at 1:30 p.m. was attended by:

Plaintiff's counsel: Andrew R. Brown of PRINCE LAW GROUP, appearing on behalf of Plaintiff MANICHANH SITIVONG ("Plaintiff").

Defendant's counsel: Skyler H. Pearson of U.S. ATTORNEY'S OFFICE, DISTRICT OF NEVADA appearing on behalf of Defendant UNITED STATES OF AMERICA



1 (“Defendant”).

2 B. Initial Disclosures. Plaintiff served her Initial Disclosures on May 17, 2022.
3 Defendant served its Initial Disclosures on May 17, 2022.

4 C. Discovery Plan. Discovery does not need to be conducted in phases. The parties
5 jointly propose to the Court the following discovery plan:

6 1. Subject of Discovery. The parties agree that they areas of discovery should
7 include, but not be limited to: all claims and defenses allowed pursuant to the Federal
8 Rules of Civil Procedure.

9 2. Discovery Cut-Off Date(s). Discovery will take 180 days, measured from the
10 date of the parties’ FRCP 26(f) conference, which means all discovery must be completed
11 by **Monday, October 31, 2022**.

12 3. Amending the Pleadings and Adding Parties. The last date for filing
13 motions to amend pleadings or to add parties shall not be later than 90 days prior to the
14 close of discovery. In this action, the last date to file motions to amend the pleadings or
15 add parties shall be **Tuesday, August 2, 2022**.

16 4. FRCP 26(a)(2) Disclosures (Experts). The last day to disclose expert
17 witnesses shall be 60 days before the discovery cut-off date. In this action, the last date
18 to disclose experts shall be **Thursday, September 1, 2022**. The date for the disclosure
19 of rebuttal expert witnesses shall be 30 days after the initial disclosure of experts. In this
20 action, the last date to disclose rebuttal experts shall be **Monday, October 3, 2022**
21 **(actual due date is Saturday, October 1, 2022)**.

22 5. Dispositive Motions. The last date to file dispositive motions shall not be
23 later than 30 days after the discovery cut-off date. In this action, the last date to file
24 dispositive motions shall be **Wednesday, November 30, 2022**.

25 6. Joint Pretrial Order. The Joint Pretrial Order shall be filed no later than 30
26 days after the date set for filing dispositive motions. In this action, the joint pretrial order
27 shall be filed on or before **Friday, December 30, 2022**. If dispositive motions are timely
28 filed, the date for filing the Joint Pretrial Order shall be suspended.



1 7. FRCP 26(a)(3) Disclosures. The disclosures required by FRCP 26(a)(3) and
2 any objections thereto shall be included in the Joint Pretrial Order.

3 8. Alternative-Dispute Resolution. The parties certify that they met and
4 conferred about the possibility of using alternative-dispute resolution processes including
5 mediation, arbitration, and if applicable, early neutral evaluation pursuant to LR 26-
6 1(b)(7).

7 9. Alternative Forms of Case Disposition. The parties certify that they
8 considered and did not consent to trial by magistrate judge under 28 U.S.C. § 636(c) and
9 Fed. R. Civ. P. 73 and the use of the Short Trial Program (General Order 2013-01).

10 10. Electronic Evidence. The parties certify that they discussed whether they
11 intend to present evidence in electronic format to jurors for the purposes of jury
12 deliberations. The parties will enter into stipulations before trial about providing
13 discovery in an electronic format compatible with the Court's electronic jury evidence
14 display system.

15 D. Consent to Service by Electronic Means through Electronic Mail. The undersigned,
16 on behalf of Plaintiff and Defendants, hereby consent to service of documents by
17 electronic means via electronic mail and/or facsimile and/or by U.S. Mail.

18 Documents served by electronic means must be transmitted to the following person
19 at the e-mail address and/or facsimile number below:

- 20 1. Plaintiffs' Attorneys: Prince Law Group
21 E-Service Address: dprince@thedplg.com, abrown@thedplg.com,
22 eservice@thedplg.com
23 Facsimile Number: 702-534-7601
24 2. Defendant's Attorneys: United States Attorney's Office
25 E-Service Address: skyler.pearson@usdoj.gov,
26 daniel.maul@usdoj.gov
27 Facsimile Number: 702-388-6787
28



1 DATED: June 3, 2022

DATED: June 3, 2022

2 **PRINCE LAW GROUP**

**UNITED STATES ATTORNEY'S
OFFICE**

3
4 /s/ Andrew R. Brown

/s/ Skyler H. Pearson

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12 *Attorneys for Plaintiff Manichanh Sitivong*

13
14 **ORDER**

15 IT IS ORDERED that ECF No. 29 is GRANTED.

16 IT IS FURTHER ORDERED that the proposed Joint Pretrial
17 Order is due 30 days after dispositive motions, if filed, are
decided.

18 IT IS SO ORDERED

DATED: 12:47 pm, June 08, 2022

19 

20 BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE

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